

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending March 31, 2020

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Finn Partners, Inc

6212

(c) Business Address(es) of Registrant

301 E. 57th St.
New York, NY 10022

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
Haldun Dincetin	2012 31st St. Apt 3C Astoria, NY 11105	United States	Partner	12/3/2019

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☒ No ☐

If yes, identify each such person and describe the service rendered.

Haldun Dincetin: media realations for the Turkish Exporters Assembly Turkey Promotion Group.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

NOTE: Short form registration for Haldun Dinncetin filed 4/29/20

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐
If yes, furnish the following information:

Foreign Principal	Date of Termination
Turkish Exporters Assembly Turkey Promotion Group	1/1/2020

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes ☒ No ☐
If yes, furnish the following information:

Name and Address of Foreign Principal(s)	Date Acquired
The Department for International Trade	March 5, 2020
3 Whitehall Place	
London SW1A 2AW	
England	

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

Jamaica Tourist Board
Turkish Exporters Assembly Turkey Promotion Group

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☒

Exhibit B⁴ Yes ☐ No ☒

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☒

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

See attached

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION**14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
10/1/19 - 3/31/20	Jamaica Tourist Board	Fees	\$ 489,052.94
10/1/19 - 3/31/20	Turkish Exporters Assembly Turkey Promotion Group	Fees	\$ 84,980.00
			\$ 574,032.94
			Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D⁸ to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐
- (2) transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
10/1/19 - 3/31/20	Jamaica Tourist Board	Expenses	\$ 277,225.57
10/1/19 - 3/31/20	Turkish Exporters Assembly Turkey Promotion Group	Expenses	\$ 35.50

\$ 277, 261.07

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes ☒ No ☐

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☐

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

Jamaica Tourist Board

Turkish Exporters Assembly Turkey Promotion Group

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☒ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (*specify*) _____

Electronic Communications

☒ Email

☐ Website URL(s): _____

☐ Social media websites URL(s): _____

☐ Other (*specify*) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (*specify*) _____

21. What language was used in the informational materials:

☒ English ☐ Other (*specify*) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☒

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☒

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

April 30, 2020

(Print or type name under each signature or provide electronic signature¹³)

Sign



Martin Ettlemyer, Chief Financial Officer

Sign

Sign

Sign

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Finn Partners, Inc.
Department of Justice Report
For the six months ended 03/31/2020
Fees and expenses

	Fees	Expenses
Jamaica Tourist Board	\$ 489,052.94	\$ 277,225.57
Turkey Promotion Group	\$ 84,980.00	\$ 35.50
TOTAL	\$ 574,032.94	\$ 277,261.07

Jamaica Tourist Board
For the six months ended 03/31/2020

<u>Date Funds</u>		<u>Purpose</u>	<u>Amount</u>
<u>Received</u>	<u>Name</u>		
10/29/2019	Jamaica Tourist Board	Fee	\$ 68,452.13
11/8/2019	Jamaica Tourist Board	Fee	\$ 8,925.00
11/15/2019	Jamaica Tourist Board	Fee	\$ 85,486.65
12/27/2019	Jamaica Tourist Board	Fee	\$ 90,000.00
1/7/2020	Jamaica Tourist Board	Fee	\$ 24,858.15
2/6/2020	Jamaica Tourist Board	Fee	\$ 90,000.00
2/7/2020	Jamaica Tourist Board	Fee	\$ 20,188.81
3/25/2020	Jamaica Tourist Board	Fee	\$ 101,142.20
	TOTAL		\$ 489,052.94
10/8/2019	Jamaica Tourist Board	Expense	\$ 9,157.96
10/29/2019	Jamaica Tourist Board	Expense	\$ 12,265.08
10/29/2019	Jamaica Tourist Board	Expense	\$ 12,880.03
11/15/2019	Jamaica Tourist Board	Expense	\$ 7,056.25
11/27/2019	Jamaica Tourist Board	Expense	\$ 1,792.66
1/7/2020	Jamaica Tourist Board	Expense	\$ 27,406.93
1/17/2020	Jamaica Tourist Board	Expense	\$ 90,000.00
2/7/2020	Jamaica Tourist Board	Expense	\$ 69,811.19
3/25/2020	Jamaica Tourist Board	Expense	\$ 46,855.47
	TOTAL		\$ 277,225.57

Turkish Exporters Assembly Turkey Promotion Group
For the six months ended 03/31/2020

<u>Date Funds</u>		<u>Purpose</u>	<u>Amount</u>
<u>Received</u>	<u>Name</u>		
10/22/2019	Turkey Promotion Group	Fee	\$ 20,000.00
12/16/2019	Turkey Promotion Group	Fee	\$ 19,980.00
1/28/2020	Turkey Promotion Group	Fee	\$ 45,000.00
	TOTAL		\$ 84,980.00
1/28/2020	Turkey Promotion Group	Expense	35.50
	TOTAL		35.50

FINN PARTNERS, INC.
Schedule of Publications on Behalf of **Jamaica Tourist Board**
For six-month period ending March 31, 2020

Description of Publications	By Whom Written, Edited or Prepared	By Whom Printed, Produced, Published	By Whom Distributed
Jamaica's Director of Tourism Donovan White Teaches Tourism	Finn Partners	Finn Partners	Finn Partners
Increased Airlift This Winter Makes Jamaica More Accessible From The United States	Finn Partners	Finn Partners	Finn Partners
Jamaica Tourist Board Hosts Diaspora Networking Reception	Finn Partners	Finn Partners	Finn Partners
Run, Recharge, Repeat – Jamaica is the Ultimate “Runcation” Destination	Finn Partners	Finn Partners	Finn Partners
Jamaica Unveils ‘Jamaica – Heartbeat of the World’ At Caribbean Marketplace	Finn Partners	Finn Partners	Finn Partners
Jamaica Offers Attractions And Activities For Travelers Booking “Appren-Trips”	Finn Partners	Finn Partners	Finn Partners
Jamaica Launches The 2020 Jamaica Rum Festival At Campari America	Finn Partners	Finn Partners	Finn Partners
Jamaica Sizzles At Food Network & Cooking Channel South Beach Wine & Food Festival With Award-Winning Culinary Talent	Finn Partners	Finn Partners	Finn Partners
The Beat – Winter Newsletter	Finn Partners	Finn Partners	Finn Partners
Meet You In Jamaica – Winter 2020	Finn Partners	Finn Partners	Finn Partners
Top Travel Agents Recognized By Jamaica Tourist Board At Annual “One Love Affair” Gala In Montego Bay	Finn Partners	Finn Partners	Finn Partners
Super Bowl LIV To Feature Jamaica's Newly Unveiled Campaign ‘Jamaica – Heartbeat of the World’	Finn Partners	Finn Partners	Finn Partners

Describe fully all activities of Registrant during the period for or in the interest of each foreign principal.

During the six months, Finn Partners, Inc. was engaged in the following activities on behalf of: Jamaica Tourist Board

1. Media Relations
2. Promotions
3. Special Events
4. Press Trips
5. Crisis Communications
6. General Counsel

FINN PARTNERS, INC.

Schedule of Publications on Behalf of **Turkish Exporters Assembly Turkey Promotion Group**
For 6/1/19 – 12/31/19 period

Description of Publications	By Whom Written, Edited or Prepared	By Whom Written, Edited or Prepared	By Whom Printed, Produced, Published	By Whom Distributed
Turkey On Track to Become Top Dried Fruits and Nuts Exporter to the United States	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Dr.Oz Touts Health Benefits of Nuts	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Turkish textile industry experiences record-breaking numbers with over \$8.5 billion in exports	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Mercedes-Benz Fashion Week in Istanbul	Finn Partners	Finn Partners	Finn Partners	Finn Partners
How Innovation Can Keep Traditions Alive In Modern Business	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Should Businesses Be Open to International Trade?	Finn Partners	Finn Partners	Finn Partners	Finn Partners
A Case for Hazelnuts	Finn Partners	Finn Partners	Finn Partners	Finn Partners
The Turkish Textile Industry to Showcase Top Exports at Leading Textiles show LATEXILE	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Turkey Olive Oil Imports to U.S. Grow By 108% from 2018	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Turkey Ready to Claim the Title as a Powerhouse in the Performance-Based Textile Industry?	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Turkish Coffee Truck Launches U.S. Tour to Bridge Cultures Through Art	Finn Partners	Finn Partners	Finn Partners	Finn Partners
Should Businesses Be Open to International Trade?	Finn Partners	Finn Partners	Finn Partners	Finn Partners

Describe fully all activities of Registrant during the period for or in the interest of each foreign principal.

During the period of 6/1/19 – 12/31/19, Finn Partners was engaged in the following activities on behalf of **Turkey Promotion Group**.

1. Media relations including responding to questions from media, fact checking and evaluating media requests for press visits
2. Write, distribute and follow up with media about press releases and pitches
3. Organize group and individual press visits
4. Organize interviews for Turkey Promotion Group spokesperson
5. Supported Turkey Promotion Group's sponsored events via media invitations and outreach
6. Monitor coverage and prepare monthly reports
7. Monthly PR status update calls
8. Provide general counsel to Turkey Promotion Group
9. Created and updated PR plan
10. Product Media Mailings